

New-Indy Catawba Mill Response to EPA CAA Section 114 Request Initial Status Update

New-Indy provides this initial status update to make EPA aware of the requested data that it (1) does not have and likely does not exist anywhere, (2) does not have but Resolute may have, or (3) does not have, but thinks that a current or former consultant may have. Requested information identified for each of these categories is identified below.

1. Information New-Indy does not have and likely does not exist.

- General Process Information

- Monthly totals of bleached pulp production prior to January 2007 or after the conversion to unbleached pulp in 2020.
- Daily kappa number of the bleached pulp from January 2005 to present. New-Indy can provide the annual average kappa numbers. New-Indy has some weekly values collected by its lab, but the comprehensiveness of that data for the requested time period is unknown at this time.
- Monthly totals of unbleached pulp production prior to January 2007.
- The date, time, and duration of when the stripper off gases were vented to the atmosphere and not sent to the corresponding air pollution control device from January 1, 2015, to present. This data point is not measured. New-Indy is reviewing available data to determine SOG venting using multiple PI tags. At this time, New-Indy is aware of a PI tag for one input into this determination that only goes back to 2019. New-Indy is searching for older PI tags that also tracked the same data, which can be used to provide a complete response.

- Recovery Boiler Nos. 2 and 3

- Black liquor recycling rate is not measured.
- Virgin black liquor dry solids firing rate is not measured.
- Black liquor dry solids concentration from the 1 evaporator in percentage solids (%) data is unavailable prior to the OI tag creation on 11/14/2020. New-Indy is reviewing old PI tags for additional data.
- Black liquor heating value is measured periodically, not daily. New-Indy will provide the available measurements.
- Black liquor organic/inorganic ratio is measured periodically, not daily. New-Indy will provide the available measurements.
- Temperature in the lower part of the furnace is not measured.
- RB3 Feedwater inlet flow rate (lb/hr) data available from 3/25/2005 to present.
- RB3 Quant air pressure data is available from 6/24/2006 to present

- RB3 Quant air flow data is available from 6/22/2006 to present.
- RB3 secondary and tertiary air flow rate from the fans data is available from 3/27/2005 to present.
- RB3 auxiliary fuel firing rates- gas data is available from 3/29/2005 to present.
- Air temperature is not measured. This value is the same as the ambient air temperature, which is measured on a different boiler and can be provided to meet this request.
- Stack gas dry volumetric flow rate – South and North. New-Indy does not have reliable information for this requested time period.
- TRS Pre-Scrubber for Sulfur Recovery System
 - Sampling data and flow rate data of the gas stream entering the sulfur recovery system. The sampling data should include, but not be limited to, hydrogen sulfide, methyl mercaptan, VOCs, and TRS compounds. Inlet flow rate is not measured. The outlet flow rate measurement includes steam rate.
 - Sampling data and flow rate data of the gas stream exiting the sulfur recovery system. The sampling data should include, but not be limited to, hydrogen sulfide, methyl mercaptan, VOCs, and TRS compounds. Inlet flow rate is not measured. The outlet flow rate measurement includes steam rate.
- Combination Boiler Nos. 1 and 2
 - Stack gas dry volumetric flow rate is not routinely measured. Available flow rate measurements are included in the provided stack test reports.
 - Most recent sulfur analysis for the TDF burned. TDF is not analyzed for sulfur. Analysis for BTU value, mercury, chlorides, and metals can be provided.
 - CB1 over fire air flow data is available from 9/06/2014.
 - CB2 over fire air flow data is available from 2/18/2020.
 - CB1 stack gas temperature data is available after 10/18/2005.
 - CB2 auxiliary fuel firing rate – oil data is available from 10/4/2005 to present.
 - Monthly SO₂ emissions records from the combustion of the NCGs and SOGs from January 1, 2015, to present. The records should include, but not be limited to, the SO₂ emission rate, the calculations used to determine the SO₂ emissions, and any documentation that justifies the information used in the calculation. This information is not available. Any available SO₂-related information is included in the permit applications.

- Monthly quantity of SOGs (scf/month) that have been incinerated from January 1, 2005, to present. This data is not measured.
- Monthly quantity of NCGs (scf/month) that have been incinerated from January 1, 2005, to present. This data is not measured.
- 40 C.F.R. Part 63 Subpart S
 - Sampling data and flow rate data associated with each pulping process condensate stream listed in 40 C.F.R. § 63.446(b) from September 2000 to present. New-Indy does not have data prior to the installation of the steam stripper. The flow rate is calculated from measurements of the inlet and outlet flows.
 - Initial characterization sampling data and flow rate data associated with each pulping process condensate stream listed in 40 C.F.R. § 63.446(b) used to show compliance with 40 C.F.R. § 63.446(c). New-Indy has an engineering report from 1998, but is unaware of additional characterization data at this time.
 - Documents that discuss the differences in concentration data and flow rate data of each condensate stream listed in 40 C.F.R. § 63.446(b) from September 2000 to present. New-Indy does not have data prior to the installation of the steam stripper. The flow rate is calculated from measurements of the inlet and outlet flows, not measurements from each condensate stream.
 - Records of the annual pulping system closed collection system Reference Method 21 evaluations from January 2010 through June 2021. Records prior to January 2014 are unavailable.
 - Records of the monthly condensate closed collection system inspections from January 2010 through June 2021. Records prior to January 2014 are unavailable.
 - Records of the annual condensate closed collection system Reference Method 21 evaluations from January 2010 through June 2021. Records prior to January 2014 are unavailable.

2. Information New-Indy does not have but Resolute may have.

- New-Indy has not identified any data in this category.

3. Information New-Indy does not have but a current or former consultant may have.

- New-Indy has not identified any data in this category.